

UST Operator Training Frequently Asked Questions

Q. What is Operator Training?

A. Operator Training is a program required by the federal Energy Policy Act of 2005. The program requires that UST facilities have individuals trained to operate UST in compliance with operating requirements, and that someone is trained to take action in the event of a release from the UST system.

Tennessee has developed rules for the Operator Training program which have been approved and will be available on the Secretary of State's website in the near future.

Tennessee has two testing options which will be acceptable for Operator Training: Tennessee has developed a Tennessee-specific UST System Operator Exam administered by the [International Code Council](#). We would consider passing this examination as adequate evidence of being trained in the basics of underground storage tank operation. The Tennessee specific UST System Operator Exam was modeled after the national UST System Operator Exam. If anyone has successfully passed the national UST System Operator Exam, we would also recognize that adequate documentation of meeting the training requirements.

Tennessee has one classroom training option which will be acceptable for Operator Training: Since 2005, Tennessee has held occasional 1-day training sessions called "**Tank School**", taught by state instructors. Anyone completing Tank School will be considered as having met the training requirements for Operator Training. Tank Schools are only held occasionally as time and instructor availability permits. Contact the Division if you would be interested in attending Tank School, and if class space is available you may get an opportunity to attend a Tank School near you.

Tennessee has developing a free web-based training option for Operator Training. The web-based training is called "**Tank Helper**"

Along with the Tank Helper training application, the division has developed an Operator Training tracking database that must be used by tank owners to designate different levels of operators for the UST systems that they own. Each tank owner must use the database to make Operator designations, regardless of the method of operator training they select.

Q. Who has to take operator training?

A. Anyone who is assigned by the tank owner as a Class A, Class B or Class C Operator (see question below about Classes of Operators) at a minimum will need to take training appropriate for the responsibilities of that category.

Q. How much is the training going to cost?

A. Training need not be expensive. The web based option will be free, and currently there is no charge for Tank School. There is a fee for the ICC testing option.

Q. How often do operators have to be trained?

A. Operator training is intended to be a one-time event, however if significant operational compliance violations are discovered during a compliance inspection, operator(s) must be retrained. Retraining will consist of several options and may be specific to the violation, or general in nature. Retraining options will be developed as the program is implemented.

Q. Why am I being required to designate operators for my facility, since I have never had any violations?

A. Operator Training is a component of the Energy policy Act of 2005 passed by the federal government. This requirement affects every state Underground Storage Tank program that received federal grant money, so everyone must comply regardless of their past compliance history.

Q. I am a one facility owner with no employees; do I still have to designate an operator?

A. Yes. See the answer to the Question above. Every facility will be required to designate at least one individual in each class of operator. The owner may designate himself in each class and take training appropriate to all operator classes.

Q. I don't have a computer, is there another way to designate my operators?

A. You will need access to a computer in order to access Tennessee's web-based Operator Training program and log in and designate operators for your facility(ies). Most major public libraries have public computers with internet access and you may use these if you lack a computer or internet access.

Q. Will Tennessee recognize Operator Training provided by my company or other outside parties?

A. No. Other states may accept any of the four Tennessee training options mentioned above as adequate for their state, but Tennessee will only accept the training methods mentioned above.

Q. When will facilities be required to have trained Operators in Tennessee?

A. The rules will require every UST system to have a trained operator by **August 8, 2012**. We encourage tank owners to comply early with the Operator Training requirements by taking advantage of one of the four training options available. It will be a violation for any UST facility to operate without trained operators designated after August 8, 2012. If you have not designated trained operators for each of your facilities by August 8, 2012 **you will be scheduled for an inspection** and you could face fines and penalties, including possible delivery prohibition.

Q. I heard that there are several classes of operators and different training for each class. Is that correct?

A. Yes. There are three Operator Classes that are defined as follows:

A Class A Operator is any person having primary responsibility for on-site operation and maintenance of underground storage tank systems.

A Class B Operator is any person having daily on-site responsibility for the operation and maintenance of underground storage tank systems.

A Class C Operator is any on-site employee having primary responsibility for addressing emergencies presented by a spill or release from an underground storage tank system.

The testing options described above administered by ICC covers Class A and B Training requirements. Tank School covers Class A, Class B and Class C Training requirements. Training provided by the testing options and Tank School is general in nature and not facility specific.

Tank Helper can be configured to your specific facility and provide training in Class A or Class B (which also includes Class C training if either of those options are chosen), Class A and B together, or Class C only.

Q. I have been told that I must have several operators designated for my facility. Is that true?

A. The answer may depend on how complex your business is. Facilities will be required to have at least one person designated in each of three Operator classes. One person can be designated as a Class A, Class B, and Class C Operator for a facility, or separate individuals can be designated for each class. A single individual may be designated as a Class A and/or a Class B operator for more than one location. Several individuals at each location may be trained as Class C operators. If tank owners want additional individuals trained, there is no restriction on how many individuals may be trained at a facility as long as there is at least one individual designated for each class assigned to each facility.

Q. Can tank owners designate an independent service provider as the trained operator for their facilities?

A. Yes. Tank owners may designate service providers and independent consultants as trained operators for their facilities, as long as the designated individual has met one of the training options described above provided by the state, enters that information into the Operator Training tracking database and accepts the designation from a UST owner.

Q. Once I designate operators for my station, am I allowed to change operators?

A. Yes, you may change operator designations at any time by logging on to your user profile on the Tank Helper program and making the changes in the tracking database. The rules require the notification of changes in designations of Class A or Class B operators to be made within 30 days of the change.

Q. Who can I contact for more information about the options for Operator Training?

A. Contact Michelle Pruett at michelle.pruett@tn.gov, or by phone at (615) 532-0973, or Lamar Bradley at lamar.bradley@tn.gov , or call (615)532-0952.